

Exhibit C

Subject: Polysciences v. Masrud
Date: Sunday, December 13, 2020 at 8:47:41 PM Eastern Standard Time
From: Julianne Peck
To: Reed, Eric E., cspota@foxrothschild.com
Attachments: image001.png, image002.png

Hi Eric,

You have identified four additional witnesses as responsive to Masrud's Interrogatory Nos. 2 and 3 in Polysciences' Opposition to Masrud's Motion to Compel. While you state that these individuals were identified "promptly" through supplemental responses, I cannot find any supplemental response from you (or your firm) identifying these individuals.

Can you please forward me the alleged supplemental responses (together with any proof they were previously forwarded) by COB tomorrow.

Thanks,
Juli



Julianne Peck 43 Paoli Plaza #426
215.868.6214 Paoli, PA 19301
HomansPeck.com

HOMANSPECK, LLC 2020
RECOGNIZED BY
Best Lawyers

Subject: RE: Polysciences v. Masrud
Date: Monday, December 14, 2020 at 9:54:30 AM Eastern Standard Time
From: Spota, Cali R.
To: Julianne Peck
CC: Reed, Eric E., Lagarenne, Jonathan R., Norton, Gerard P., Puls, Bret A.
Attachments: POLYSCIENCES, INC.'S FIRST SUPPLEMENTAL ANSWERS AND OBJECTIONS TO DEFENDANT'S FIRST SET OF INTERROGATORIES-1-C1.pdf

Juli,

Attached for service, please find Polysciences' First Supplemental Answers and Objections to Defendant's First Set of Interrogatories. Verification of same will follow separately.

Best regards,

Cali

Cali R. Spota
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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

POLYSCIENCES, INC.

Plaintiff,

v.

JOSEPH T. MASRUD,

Defendant.

Civil Action No. 2:20-cv-03649-PBT

**PLAINTIFF POLYSCIENCES, INC.'S FIRST SUPPLEMENTAL ANSWERS AND
OBJECTIONS TO DEFENDANT'S FIRST SET OF INTERROGATORIES**

Plaintiff Polysciences, Inc. ("Polysciences"), by and through its undersigned counsel and pursuant to Rule 33 of the Federal Rules of Civil Procedure, hereby supplements its responses to Defendant Joseph T. Masrud's ("Masrud") First Set of Interrogatories ("Interrogatories") as follows:

**GENERAL OBJECTIONS AND SPECIFIC OBJECTIONS TO
DEFINITIONS AND INSTRUCTIONS**

Polysciences incorporates all of its General Objections and Specific Objections to Definitions and Instructions as set forth in Polysciences' Answers and Objections to Defendant's First Set of Interrogatories.

ANSWERS TO INTERROGATORY NOS. 2 AND 3

INTERROGATORY NO. 2: Identify each person with knowledge of Polysciences' research and development of its PEI Max, MW 40,000 HCE salt (PN 24765) and Transporter 5 products.

ANSWER:

Polysciences incorporates all its General Objections as set out above. Polysciences objects to this Interrogatory as overly broad and unduly burdensome to the extent it requires Polysciences

to ascertain “each person with knowledge of the method, specifications, materials and processes Polysciences has used from its initial development through September 2019 of its PEI Max, MW 40,000 HCE salt (PN 24765) and Transporter 5 products.”

Subject to and without waiving its objections, Polysciences responds as follows:

See answer to Interrogatory 2. Further, Polysciences directs Masrud to Polysciences’ Initial Disclosures.

SUPPLEMENTAL RESPONSE:

Subject to and without waiving its objections, incorporated herein, Polysciences directs Masrud to its Supplemental Response to Interrogatory No. 2.

Discovery is ongoing. Polysciences reserves the right to amend and/or supplement its response, if appropriate, in view of further fact and expert discovery, investigation and research regarding the issues raised in this Interrogatory.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 14th day of December 2020, a copy of the foregoing was served on all counsel of record for Defendant in the action via electronic mail to:

Homans Peck, LLC
Julianne Peck, Esq.
1500 John F. Kennedy Blvd.
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Philadelphia, PA 19102
Phone: (215) 868-6214
JPeck@HomansPeck.com

Date: December 14, 2020

By: /s/Cali R. Spota
Cali R. Spota